April 15, 2010

Project 15210.000

Ms. Erin J. Rednour
Project Manager, National Priorities List Unit
Federal Sites Remediation Section
Bureau of Land
Illinois Environmental Protection Agency
1021 North Rand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

Subject: Response to Illinois Environmental Protection Agency Letter Dated March 16, 2010 Former Chemetco, Inc. Facility 3754 Chemetco Lane Hartford, Illinois

Dear Ms. Rednour:

AMEC Geomatrix, Inc. (AMEC), on behalf of Industrial Asset Disposition, LLC (IAD) and the Bankruptcy Estate of Chemetco (Estate), has prepared this letter in response to the Illinois Environmental Protection Agency (IEPA) and U.S. Environmental Protection Agency's (U.S. EPA) comments dated March 16, 2010, regarding the previously submitted Demolition Work Plan by AMEC, for the Foundry and Tank House Buildings and adjacent American Air Filter (AAF) System (Demolition Plan), dated December 11, 2009.

The IEPA and U.S. EPA's comments have been numbered and are restated below in *italics* followed by AMEC's response in regular font. These responses will be incorporated into the revised Demolition Plan then provided to IEPA and U.S. EPA to facilitate their expedited review of the Demolition Plan.

COMMENTS FROM ILLINOIS EPA:

Site Preparation Activities:

1. *A number of the plan provisions lack the necessary detail to fully evaluate whether the proposed work will comply with the Interim Consent Order (or proposed Consent Decree) including failing to identify Applicable or Relevant and Appropriate Requirements (ARARs) or to describe how the work will comply with those obligations.*

AMEC Geomatrix, Inc.
510 Superior Avenue, Suite 200
Newport Beach, CA
USA 92663-3627
Tel (949) 642-0245
Fax (949) 642-4474
www.amecgeomatrixinc.com

AMEC Geomatrix

AMEC Response: Appendix A of the current Interim Order (IO) provides an ARAR Source List that IEPA recommends for inclusion into work plans prepared pursuant to the IO. These ARARs reference IEPA Regulations 35 III. Administrative Code (IAC) Parts 721 through 726 and Part 212. The regulatory references in Appendix A are Resource Conservancy Recovery Act (RCRA) Subtitle C requirements and the IEPA identifies these RCRA Subtitle C requirements as suggested ARARs for managing the material associated with the demolition activities at the Chemetco site (Site).

RCRA and their corresponding ARARs specific to the demolition work to be conducted at the Site have been developed and are included in revised Table 1 (attached). While some of the material has been documented as characteristically hazardous, neither IAD nor its contractors will dispose of the metal bearing materials (MBM) relocated in order to carry out demolition; therefore the ARARs noted in revised Table 1 are specific to certain waste separate and apart from the MBM and how that waste will be managed.

As described in U.S. EPA Directive 9234.2-04FS, when RCRA requirements are ARARs, only the substantive requirements of RCRA must be met if a Comprehensive Environmental Response Compensation and Liability Act (CERCLA) action is to be conducted at the Site. This Site was recently listed on the National Priority List by EPA and on-site actions do not require RCRA administrative requirements such as permits, recordkeeping and reporting nor is compliance with other administrative requirements necessary for on-site actions *(See, e.g., "RCRA ARARs: Focus on Closure Requirements," OSWER 9234.2-04FS (October 1989).* That guidance at page 1 states that *"On-site actions do not require RCRA permits, nor is compliance with administrative requirements necessary for on-site actions."* Also, page 2 of that guidance states that *"Administrative Requirements….include the requirement for preparing contingency plans….recordkeeping, and consultations."* During the demolition, compliance with the appropriate substantive requirements only as specifically noted on revised Table 1 (attached) will be met.

2. *The plan does not comport with the guidelines applicable to Work affected materials (WAM). In accordance with the Interim Order, there is to be no consolidation of materials associated with the work performed under this plan with existing materials.*

AMEC Response: Efforts will be made to minimize handling and relocation of black slag materials present within the proposed work area. Slag that requires relocation will be moved to open slab areas and kept separate from other existing stockpiles. Other MBM collected from the Foundry and Tank House Buildings will be stockpiled in the Fines Building (please see the Response to Comment # 20). MBM present within the Dome Building will be relocated to the DIS Building (please see the Response to Comments #6 and #10).

The provisions cited in revised Table 1 are provisions that constitute RCRA ARARs for how the MBM will be handled based on the MBM being characteristically hazardous but relocated and staged only and not generated as a waste as a result of such relocation and staging. In addition, Table 2 of the Demolition Plan is a debris (in contrast to a MBM) handling matrix. The debris materials listed on this table will be collected and disposed of off-site. As noted in Table 2 and based on previous disposal of this material by the Estate, the only waste in this debris matrix previously considered characteristically hazardous is the

paper and cardboard. Under normal circumstances, this material could be considered garbage and refuse that make up the former Chemetco facility's trash stream and potentially considered non-hazardous; however, this material is at the present time discarded material and is then considered a waste. Therefore, a hazardous waste determination/identification ARAR is the appropriate ARAR as listed on revised Table 1.

In summary, revised Table 1 provides a more detailed ARAR analysis specific to RCRA-based requirements given that RCRA requirements are applicable to the Site as an interim status facility which will later be addressed under a CERCLA remedial action. It should be noted that the ARARs listed in Table 1 are specific to the demolition work only and until specific remedies for others portions of the Site are identified, ARARs under CERCLA or other RCRA areas cannot be identified and are not proposed in this Work Plan. Table 1 (attached) and included in the responses below include the RCRA ARARs sufficient both to safely manage MBM and the waste associated with the demolition activities.

3. *Further, under Section V General Provisions, 5. Commitment to Proper Management of the Facility, The Trustee shall manage the Facility in accordance with this Interim Order and in accordance with all plans, standards, specifications, and schedules set forth in or developed in Work Plans approved by the State, pursuant to this Interim Order.*

AMEC Response*:* One of the goals of IAD and the Estate in providing the Demolition Plan and this response to the Demolition Plan comments is to have the approved Demolition Plan be the governing document with regard to performance of demolition covered by the Demolition Plan. Note that, while the Demolition Plan is being submitted in the Estate's name under the IO, the actual work will be managed by IAD working in close communication with the Estate's on-site personnel. It is our understanding that, once the revised Demolition Plan is approved, performance of the demolition activities consistent with the revised Demolition Plan satisfies the Agency's requirement that "*The Trustee shall manage the Facility in accordance with this Interim Order and in accordance with all plans, standards, specifications, and schedules set forth in or developed in Work Plans approved by the State, pursuant to this Interim Order*" without the Estate or Trustee needing to refer to any other previously approved plans to determine whether the demolition is in compliance with the IO.

4. *The trustee shall manage all Work Affected Materials as if it were a RCRA Hazardous Waste in accordance with the hazardous Waste regulations.*

AMEC Response: This is a unique demolition project requiring the relocation of MBM. As explained in the Demolition Plan, much of the MBM will be relocated on-site in order to safely and efficiently demolish the structures. The long term plan for this material is for it to be reprocessed on-site to reclaim the metals from the material. While some of the material has been documented as characteristically hazardous, neither IAD nor its contractors will dispose of the MBM relocated in order to carry out demolition.

Accordingly, it is IAD 's and the Estate 's understanding that movement of MBM consistent with the Demo Plan and these comments does not trigger any RCRA requirements other than those specified in revised Table 1 and is, therefore, consistent with the IO.

5. *While we understand that Work Affected Material resulting from these activities may be used in planned processing activities, the plan does not describe how those materials will be identified, how and when they will be incorporated into the processing schedule or what their disposition will be if found to be unsuitable for processing. The plan must demonstrate that retention of these materials will benefit the Estate and not become a lingering problem.*

AMEC Response: Virtually all the MBM present at the Site can be processed into commodity products and sold, which will eliminate costly off-site landfill disposal. The only items that will be unsuitable for processing are deleterious non-MBM and debris that is screened out of the MBM stream. These items will be containerized, sampled and profiled for off-site disposal.

Processing work will initially address the finer-grained MBM presently located in various buildings on-site, followed by larger accumulations located in bunkers and stockpiles. It is anticipated that scrubber sludge accumulations will be processed over the course of the next 1 to 3 years in the following approximate order:

- Fine-grained scrubber dust to be collected from the Foundry and Tank House Buildings during pre-demolition Site preparation activities and relocated to the Fines Building (approximately 4,000 tons)
- "Super Sacks" within the former Receiving Building (approximately 200 tons)
- Scrubber sludge present in the DIS Building (approximately 5,000 tons), including material relocated from the Dome Building during demolition activities
- Scrubber sludge present within the Zinc Oxide Bunker (approximately 55,000 tons)

Once the majority of finer-grained MBM are processed, collection and processing efforts will then focus on fine and coarse black slag deposits present at the Site. Thus, the benefit to the Estate is that the Demolition Plan allows the MBM, which is presently scattered throughout the facilities to be demolished, to be stored in much more stable conditions until the MBM become an income stream for the Estate through the processing work described above. Movement of the MBM necessary to perform demolition safely in accordance with the Demolition Plan as modified by this response to the Demolition Plan comments will make the MBM considerably less of a "lingering problem" than it is today. Thus, the fact that MBM is moved to carry out demolition safely should not trigger any RCRA requirements other than those identified in revised Table 1 and IAD and the Estate respectfully request written confirmation of same through approval of the revised Demolition Plan.

6. *Section 2.2, paragraph 6 states: the metal bearing material present in many areas of the proposed demolition work areas will be collected, consolidated, and temporarily stored on-site during the demolition phase to more safely allow many of the former structures to be demolished in preparation for on-site processing activities.*

The plan does not fully describe how those materials will be collected or the ARARs applicable to such activities. The plan does not define what is meant by "consolidated", where or how that will be done or the ARARs applicable to such activities. ***There cannot be any consolidation of materials associated with the work performed under this plan with existing materials****. The plan does not fully describe how those materials will be temporarily stored or the ARARs applicable to such activities*

AMEC Response: Please see the Response to Comment #20. The term "consolidated" as used in the Demolition Plan, means to gather and collect like materials from more than one place within a specific building or area since they need to be relocated, and stockpiled together at a new location on-site in order to safely and effectively conduct the pending demolition. In general, the MBM that is gathered during demolition will be stockpiled separately from existing piles on-site, except for the MBM present within the Dome Building that will be relocated inside the adjacent DIS Building. The scrubber sludge that is broadly dispersed within both the Foundry and Tank House Buildings will be gathered and safely moved to a common area for storage for future processing. The MBM from these two buildings is proposed to be temporarily stored together within the Fines Building for future on-site metal recovery processing.

The MBM will be gathered with equipment appropriate for the task at hand (as described herein) depending on the quantity present within a given area, and its location, including but not limited to, the ground or slab surface, building structural beams, inside equipment, ducting or structures, or present on elevated floors or walkways. Generally, large accumulations on the open ground, floor or slab surfaces will be collected with heavy equipment such as a loader, bobcat or backhoe and placed inside a closed top bin for transfer to the Fines Building where the closed top bin will be dumped (emptied on the floor slab) and the material will be pushed into a single stockpile and stored in bulk. Residual quantities remaining after collection with heavy equipment will be gathered by sweeping, shoveling and/or vacuuming. This MBM will also be transferred to the Fines Building. MBM present on the horizontal surfaces of interior building structural members will be collected by vacuuming then transferred to a bulk container for relocation to the Fines Building. There may be certain instances, such as close quarter areas, that limit or prevent access of construction equipment, and material there will be collected with a mini vacuum and placed into a Super Sack instead of a covered bin for handling purposes. It is anticipated that this "close quarter" handling would be done on a very limited basis.

Personnel handling MBM capable of becoming airborne will wear Level C personal protective equipment (PPE) during collection, handling and stockpiling activities. Please see revised Table 1 (attached) with respect to ARARs for this element.

7. *Section 3.1, bullet point 11 states: Collect slag materials and small stockpiles located on the slab surfaces in proposed staging areas and adjacent to structures proposed for demolition and consolidate it on-site with like materials in existing stockpiles for future processing activities.*

The plan does not fully describe how those materials will be collected or the ARARs applicable to such activities. ***There cannot be any consolidation of materials associated with the work***

performed under this plan with existing materials*. The plan must be revised to fully describe how those materials will be temporarily stored and the ARARs applicable to such activities.*

AMEC Response: As stated in Section 3.1, Bullet 11, and more specifically in Section 5.4, paragraph two, the large open slab area to the west of the Dome Building will be useful for staging of decontaminated steel proposed for off-site salvage, or other collected debris placed in bins or gathered in temporary piles for off-site disposition. Numerous small slag piles placed within this area by Estate personnel within the past 5 years limit the available space for material staging.

As discussed with IEPA personnel during the Site tour on March 30, 2010, the small stockpiles west of the Dome Building will be gathered with a loader and transported to a different location on a portion of open concrete slab and stored for future processing. Locations will be selected that are not within active work zones or travel paths for heavy equipment movement. These areas include, but are not limited to, the northeast corner outside of the existing DIS Building, and other unoccupied areas to the west and north of the present piles. Relocated slag would be placed outdoors on a portion of open and unoccupied concrete surface slab and kept separate from any other slag material. The relocated slag material would be placed directly on the concrete slab, without perimeter berms or cover, in an area that does not pond or accumulate storm water, and their location will be noted on a Site figure.

Please refer to revised Table 1 (attached).

8. *Section 4.0, paragraph 4 states: Metal Bearing Materials that are collected and handled as part of the demolition work will be stored in a contained and controlled manner. If during demolition work it becomes necessary to relocate stockpiles of materials (ex. Slag pile blocking dock at Dome Building), they will be relocated to stockpiles of similar materials and in a manner that does not increase the potential for release from the Site.*

The plan does not fully describe how those materials will be collected or the ARARs applicable to such activities. ***There cannot be any consolidation of materials associated with the work performed under this plan with existing materials****. The plan must be revised to fully describe how those materials will be temporarily stored and the ARARs applicable to such activities.*

AMEC Response: Please see the Response to Comment #7.

9. *Section 5.4, paragraph 3 states: Slag and metal bearing materials that are present within the proposed demolition work zone and adjacent staging areas will be collected and consolidated with other existing larger piles of similar composition until they can be processed on Site under procedures to be described in a subsequent Slag Processing Work Plan.*

The plan does not fully describe how those materials will be collected or the ARARs applicable to such activities. ***There cannot be any consolidation of materials associated with the work***

performed under this plan with existing materials*. The plan must be revised to fully describe how those materials will be temporarily stored and the ARARs applicable to such activities*

AMEC Response: Please see the Response to Comments #5 through #7 previously.

10. *Section 5.5.3 states: Existing piles of scrubber sludge and slag fines present in the Dome Building will be relocated into the adjacent DIS building or with other larger piles of like material, for storage until subsequent on-Site processing can be performed.*

The plan does not fully describe how those materials will be collected or the ARARs applicable to such activities. ***There cannot be any consolidation of materials associated with the work performed under this plan with existing materials****. The plan must be revised to fully describe how those materials will be temporarily stored and the ARARs applicable to such activities.*

AMEC Response: This comment refers primarily to the MBM present within the Dome Building which will be relocated to inside the DIS Building and stored with other like material there for future processing. The MBM currently present within the DIS Building will be pushed into a stockpile toward the interior walls with a rubber-tired loader to create additional available space for material storage. The MBM in the Dome Building will then be moved with a loader and placed in a separate stockpile inside the DIS Building yet directly adjacent to the existing DIS Building MBM. For safety purposes, this relocation work will not be performed until after the collapsed roof is removed from the Dome Building.

Please see the Response to Comment #1 and revised Table 1 (attached) with respect to ARARs.

11. *Section 5.5.3, Wet Decontamination Facility - No material from the Dome Building may be moved to any other area of the Chemetco Facility other than the DIS Building. No fines from the Dome Building may be stored outside.* ***There cannot be any consolidation of materials associated with the work performed under this plan with existing materials****. The plan must be revised to fully describe how those materials will be temporarily stored and the ARARs applicable to such activities.*

AMEC Response: Please see the Response to Comment #10.

12. *Section 3.6, paragraph 2 states: A portion of the AAF area is subject to additional cleanup measures as described in the work plan titled "RCRA Closure Plan, AAF Decontamination Area and Sump, January 31, 2008." Prior to commencing with the proposed AAF demolition activities, the remediation objectives described in the RCRA Closure Plan associated with cleaning the slab and sealing the sump in this area will be implemented and documented, so the space will be available as useable working and lay-down areas during the subsequent demolition activities there. The closure documentation associated with the RCRA Closure Plan will be submitted to the IEPA along with other demolition related completion documents at the conclusion of the demolition activities described in this Plan. The Estate*

considers approval of this Work Plan to be approval of a modification of the IO consistent with the discussion in this paragraph.

The work performed pursuant to the RCRA Closure Plan, AAF Decontamination Area and Sump shall be certified as complete in accordance with the Interim Order Section XIII. Certification of Completion, paragraph 46. Completion of Work Plans. The Certificate of Completion shall be obtained prior to demolition of the AAF Area.

AMEC Response: As discussed with IEPA, U.S. EPA, and Estate personnel during the Site tour on March 30, 2010, remedial actions including pumping accumulated storm water in the work area to the north Polishing Pit, washing the slab, sealing the storm water sump, sealing of holes and/or deep cracks that extend through the complete slab thickness, and documentation of these actions will be performed prior to demolition of the AAF area. This information will then be compiled into a closure submittal by Estate personnel and submitted to IEPA for review and acceptance. IEPA personnel would visually inspect the work for completeness relative to the remediation objectives prior to submittal of any closure documentation by the Estate. Once the closure information is submitted, IAD is allowed to continue with demolition of the AAF area and does not have to wait for IEPA review of the closure documentation and issuance of the closure certificate to the Estate in order to proceed with demolition of the AAF area.

13. *The work performed pursuant to the RCRA Closure Plan, AAF Decontamination Area and Sump shall be certified as complete in accordance with the Interim Order Section XIII. Certification of Completion, paragraph 46. Completion of Work Plans. The Certificate of Completion shall be obtained prior to demolition of the AAF Area.*

AMEC Response: Please see the Response to Comment #12. With respect to ARARs the area is identified in the RCRA Closure Plan as a former sump and decontamination area. As described above, the closure activities will be performed prior to demolition activities. Based on the RCRA Closure Plan approach and the demolition there is likely to be some slag and sludge fines associated with sweeping and cleaning of the slab areas, along with wash water form the slab pressure washing and spent PPE. Determination of whether the generated material and wash water is a RCRA hazardous waste is required under 40 Code of Federal Regulations (CFR) §261.11. This ARAR is listed in revised Table 1 (attached).

14. *Section 5.7 AAF Decontamination Area and Sump, paragraph following item 6 states: Once the AAF Decontamination area has been cleared and the sump is sealed, the AAF decontamination area and sump will be open and available to the contractor without restriction for staging and/or lay down of equipment or other.*

The work performed pursuant to the RCRA Closure Plan, AAF Decontamination Area and Sump shall be certified as complete in accordance with the Interim Order Section XIII. Certification of Completion, paragraph 46. Completion of Work Plans. The Certificate of Completion shall be obtained prior to demolition of the AAF Area.

AMEC Response: Please see the Response to Comment #12.

15. *Section 8.0 Record drawings and Closure/Completion Certification states: Within 45 days of completion of demolition and waste disposal activities and receipt of all disposal records, a completion report will (be) prepared and submitted to IEPA that includes information regarding the RCRA closure documentation associated with the AAF Decontamination Area and Sump.*

The work performed pursuant to the RCRA Closure Plan, AAF Decontamination Area and Sump shall be certified as complete in accordance with the Interim Order Section XIII. Certification of Completion, paragraph 46. Completion of Work Plans. The Certificate of Completion shall be obtained prior to demolition of the AAF Area.

AMEC Response: Please see the Response to Comment #12.

16. *Section 6.0 Demolition Activities, paragraph 1 states: Demolition activities will be performed by a licensed environmental demolition contractor under contract with IAD. Demolition activities will include removal of above ground piping, ductwork, and above ground storage tanks (ASTs) located within the demolition zone, removal and salvage of furnace ovens located in the Foundry Building, followed by demolition to slab grade of the Foundry, AAF, Baghouse and Control Room, Restroom, and Hydraulic Bailer Room, management of decontamination-derived materials, debris handling, and debris disposition and recycling.*

Please state that all interior decontamination of the Foundry Building, the management of decontamination-derived materials, and debris handling, and arrangements for debris disposition and recycling will be made prior to the removal and salvage of furnace ovens located in the Foundry Building.

AMEC Response: The interior and exterior of the AAF, and the interior of the Tank House and Foundry Buildings will be decontaminated prior to performance of any demolition activities, including furnace removal within the Foundry. Arrangements will be made for disposition of demolition debris in a timely manner, although certain items may possibly be present on site awaiting shipment when the furnace removal work is performed.

Decontamination-derived materials may include decontamination water and spent personal protective equipment (PPE). Please refer to revised Table 1 (attached) for ARAR-specific information.

17. *Please provide the name of the Site Safety Supervisor to the IEPA prior to the start of the demolition.*

AMEC Response: Comment noted. The name of the Site Safety Supervisor will be provided to IEPA prior to the start of demolition.

18. *Section 4.5 General Recordkeeping: Please provide the names of all contractor, subcontracts and employees. Include records of the amount of OSHA and EPA training each employee has received.*

AMEC Response: Comment noted. The names of demolition contractor personnel have already been provided to the Estate per the requirements of the Seal Order. Additional records consistent with the above comment will be provided to the Estate prior to the start of demolition and maintained onsite.

19. *Section 5.4.4 Metal bearing materials, such as the furnace feed material in the Foundry Building, must be repackaged in containers that are in good condition prior to being moved out of the Foundry Building. Once removed from the Foundry Building the containers must be stored in secured location (i.e., inside under cover).*

The plan does not fully describe how those materials will be collected or the ARARs applicable to such activities. ***There cannot be any consolidation of materials associated with the work performed under this plan with existing materials****. The plan must be revised to fully describe how those materials will be temporarily stored and the ARARs applicable to such activities.*

AMEC Response: The former furnace feed materials that cannot be processed on-site during pending metals processing work will be transferred to Department of Transportation (DOT)-approved shipping containers inside the Foundry Building during the performance of debris collection activities. Heavy equipment such as a Bobcat, fork lift, and/or a backhoe will be used during the transfer of these materials to new containers. The material transfer work area will be dry and free of other MBM. After transfer is complete, any residual feedstock material associated with the transfer will be swept or vacuumed up and placed within the shipping container. These repackaged materials will be sealed and labeled and will remain temporarily stored inside the Foundry Building until they are shipped off-site to yet-to-be-determined buyers of smelter feedstock materials such as these.

These MBM should not be considered hazardous waste per se since we are not disposing of them; the ARAR that would apply is the management standard for containers that hold hazardous waste under 40 CFR §265 Subpart I and as listed on revised Table 1 (attached).

20. *Section 5.6 Collection and Consolidation of Scrubber Sludge Dust – Collected dust must be managed in a tank or container. It is proposed to transport the fines to Fines Building. The Fines Building is a three sided building that is exposed to the elements. This building already contains a large amount of slag and slag fines. The plan must fully describe how those materials will be collected and the ARARs applicable to such activities There cannot be any consolidation of materials associated with the work performed under this plan with existing materials The plan must be revised to fully describe how those materials will be temporarily stored and the ARARs applicable to such activities.*

AMEC Response: Please see the Response to Comment #6 for a discussion regarding the collection of MBM present in the Foundry and Tank House Buildings. The Site received extensive rainfall this past year. The interior of the Dome and Foundry Buildings are flooded during wet winter months due to collapsed or missing roof areas and doorways that remain open year round; MBM present there is exposed to the elements including wind and

precipitation. Although the Fines Building is open on one end, the interior remained relatively dry all winter as compared to the other buildings in question that presently contain MBM.

The Fines Building consists of 6,000 square feet (ft^2) of covered area, with a concrete floor and concrete perimeter walls extending approximately 10 feet above slab grade. The remaining vertical side walls consist of steel siding. The roof is a steel truss covered with steel skin, with an interior height of approximately 20 feet at the highest point. As of March 21, 2010, five or six small piles of scrubber sludge totaling approximately 50 cubic yards (CY) or less was present in the Fines Building.

Based on preliminary volume estimates there is approximately 2,000 CY of MBM from the Foundry and Tank House Buildings that will need to be collected, relocated, and temporarily stored until it can be processed. All of this material is suitable for processing and it is anticipated that it will be in storage greater than 90 days until it can be processed on-site.

If this material were to be stored in Super Sacks, we estimate that approximately 700 CY (or 700 Super Sacks) could be safely placed in a double-stacked layer covering 90 percent of the useable floor space. There would still be an additional 1,300 Super Sacks that would require indoor storage. Presently the Receiving Building contains 100 Super Sacks of scrubber sludge and is full. Volume estimates indicate the 2,000 CY of MBM from the Foundry and Tank House Buildings can be stored in bulk in a single stockpile inside the building. The pile would cover the floor from concrete wall to concrete wall, while not allowing the upper portion of the material stockpile to be placed in direct contact with the vertical wall steel siding. The use of Super Sacks, tanks, or vessels for storage is an inefficient use of the available space in the Fines Building for indoor secure storage, will cost more, and will require more material handling effort. IAD would propose to enclose the open end of the building with a wood frame covered with corrugated fiberglass siding or other like material, to provide additional containment and protection from the elements once the material is placed there. In addition, the new wall would contain a doorway to allow access of construction equipment, and a small rounded asphalt curb would be placed on the slab across the doorway to prevent potential storm water run on from entering the building.

Please refer to revised Table 1 (attached) for ARAR-specific information.

21. *Section 5.9 Hazardous Building Material Survey – This survey identified mercury switches, fluorescent bulbs and PCB ballasts. This waste does not meet the definition of household hazardous waste. These materials are fully regulated by 35 IAC 721 – 809. The plan must be revised to describe the proper handling and disposition of such materials.*

AMEC Response: Mercury switches and fluorescent bulbs identified in the Hazardous Building Material Survey (HBMS) will be managed as universal wastes. These materials will be handled, managed, and properly disposed of following 35 IAC 733, Subparts B and D.

The quantity of light ballasts within each building was noted in the HBMS survey prepared by Geotechnology, Inc. Their report assumed that each light ballast identified was

polychlorinated biphenyls (PCB)-containing, and the condition of the light ballasts identified were assumed to be intact and non-leaking. Non-leaking PCB light ballasts do not meet the definition of a special waste but are considered a municipal solid waste. Non-leaking PCB light ballasts will be managed as a municipal solid waste following 35 IAC, Subtitle G.

22. *Section 6.3 Foundry, Baghouse and Control Room demolition – There is no mention on how the large amount of zinc oxide that is in the baghouse and baghouse collection trailer will be managed. The plan must fully describe how those materials will be collected and the ARARs applicable to such activities.* ***There cannot be any consolidation of materials associated with the work performed under this plan with existing materials****. The plan must be revised to fully describe how those materials will be temporarily stored and the ARARs applicable to such activities.*

AMEC Response: Access holes will be cut into the 12-foot diameter air collection manifold duct (main duct) on top of the Foundry Building to allow entry and cleanout of the main duct. Using specialized equipment and personnel and in accordance with confined space procedures, the contractor will push any residual standing dust remaining in the main duct to the southern end of the manifold where it will then drop down into the main reservoir. An access opening will be cut in the main reservoir where the contractor will utilize a super sucker (dry vac) to remove the material and vacuum it directly into DOT hazardous-certified close top roll-off bins. The clean out of the main reservoir and trailer will be conducted within the confines of each unit which will minimize fugitive dust during the clean out. Once the reservoir is empty, the screw conveyors at the bottom of the trough will be removed to allow access to the bags for vacuuming and collection of residual dust in the bags. Once the bags have been emptied out, the snap rings will be cut, and the bags will be folded/collapsed into the hopper to control dust. The bags will be collected at the bottom of the hoppers and placed into DOT hazardous-certified closed top bins for characterization and disposal.

Please refer to revised Table 1 (attached) for ARAR-specific information.

23. *Any Concrete generated as a result of any demolition activity may not meet the definition of Clean Construction or Demolition Debris (CCDD). All concrete must be sampled for total metals prior to crushing and reuse as fill on-site or disposal and/or transport to an off-site concrete recycling facility. IAD must obtain approval from the IEPA before classifying and concrete as CCDD, using the material as on-site fill or sending the concrete off-site.*

AMEC Response: Buildings and structures proposed for demolition will be removed down to the top of the existing slab, leaving the slab and other concrete structures intact. Concrete slab, footing, foundation, pony wall, or other potential underground structure removal work is not proposed or anticipated to be performed during the pending work described in the Demolition Plan.

It is anticipated that the only concrete debris generated will be associated with the former lead-lined concrete electrolytic cells in the Tank House Building. No other concrete slabs or foundations are scheduled to be demolished at this time. Existing concrete debris piles present at several locations around the Site will be left undisturbed, and will not be recycled or disposed off-site at this time. Visually impacted concrete (i.e., stained or discolored) from the electrolytic cells is not anticipated to be recycled on-site. It will be placed in a temporary stockpile for waste profiling purposes. Concrete that does not appear visually impacted will be placed in a separate pile. Representative samples of each pile will be obtained and analyzed separately for total and toxicity characteristic leaching procedure (TCLP) metals for waste profiling purposes prior to shipment off-site for recycling or disposal.

Please refer to revised Table 1 (attached) for ARAR-specific information.

24. *TABLE 2 – Wood, building debris, plastic and concrete are separate waste streams. Each waste steam must be sampled for TCLP metals prior to off-site disposal. Electronic waste (computer monitors and circuit boards) may not be disposed of at a landfill. These wastes may be considered hazardous wastes when sent for disposal as a solid waste.*

AMEC Response: The materials mentioned above will be collected and stockpiled separately during debris collection activities. Each debris type will be sampled for TCLP metals as applicable prior to disposal. The contractor will make every effort to separate the various debris types and waste streams present at the Site into separate piles. Some debris such as cardboard and paper cannot easily be separated from other material present. The contractor will collect and submit a representative sample from each debris pile to a third party analytical lab for TCLP analysis. The results will determine the waste profile and appropriate off-site disposal options.

Please refer to revised Table 1 (attached) for ARAR-specific information.

COMMENTS FORWARDED TO ILLINOIS EPA FROM U.S. EPA:

25. *Sections 2.3 and 5.2: The difference between existing and proposed storm water management and control measures appears to be a silt fence along the southern edge of the facility site. Implementation of the proposed stormwater best management practices (BMPs) should be documented in any reports required by Illinois EPA. Discharges from Outfall #5 must comply with the facility's National Pollutant Discharge Elimination System permit.*

AMEC Response: Comment noted. A revised Figure 5 has been attached for your review. This new figure will also be incorporated into the facility Stormwater Pollution Prevention Program (SWPPP) maintained by the Estate. The revised Figure 5 shows the diversion and collection features that will be installed at the Site during demolition. SWPPP measures will be inspected weekly and documented on a form and maintained on file at the Site. As discussed with IEPA, U.S. EPA, and Estate personnel during the Site tour on March 30, 2010, storm water that will collect in the two existing sumps on the south fence line will be diverted through an existing 6-inch above ground PVC pipe that connects to the Retention

Basin. Storm water will then discharge in a controlled manner through Outfall #5 under the existing conditions stated in the National Pollutant Discharge Elimination System permit. IAD will also place cobble-sized limestone aggregate along the banks of the south side of the Retention Basin at the present discharge points for purposes of erosion control and preventative maintenance. Water that may accumulate within the AAF area is presently removed via the Main Pump House and either transferred to the former cooling canals or directed to spray irrigation for purposes of evaporation and volume control. Once demolition starts, spray irrigation for volume control will likely cease and any water removed from the AAF area via the Main Pump House will be conveyed to the existing cooling canals.

26. Sections 3.3 and 6.7: The proposed demolition plan for the Black Acid Tank Solid Waste Management Unit (SWMU) should meet the substantive requirements for closure under the Resource Conservation and Recovery Act (RCRA).

AMEC Response: Closure activities will be performed, in parallel with other demolition work that will be on-going at the Site under the Demolition Plan, in compliance with 40 CFR §265.197 Closure and Post-Closure Care. The interior of the Black Acid Tank was decontaminated although written verification of this step cannot be found at this time. Chemetco submitted a revised soil sampling plan on September 2, 2000, although it is not clear if the IEPA ever approved the plan. The Estate will prepare a closure work plan for submittal to IEPA for review.

27. Section 3.4 and 6.4.3: Regarding disposal of the refractory brick, a determination should be recorded whether this is RCRA hazardous waste produced in the former Brick Shop. It is estimated that 70 tons of this material is on site.

AMEC Response: Please note that the refractory brick contains many of the target metals proposed for processing separation. The refractory brick can be crushed and processed on site, in a manner similar to other MBM present on site. Any existing spent refractory brick present within the demolition work zone will be collected and stored in an appropriately sized closed top container onsite. Spent refractory brick removed from furnaces will also be stored in closed top containers onsite for subsequent processing with other MBM.

Spent refractory bricks are not considered solid waste, and therefore not hazardous waste. The process for recycling could potentially be crushing the bricks and reusing the material in the MBM processing. Based on this approach, no ARAR is necessary for this material (40 CFR 261.2(e)(1)(i).

28. Section 4.3: It is the position of EPA that all work activities at the site be performed in compliance with applicable federal and state Occupational Safety and health Administration regulations for all types of wastes and activities at the site, and the Illinois EPA should review the Health and Safety Plan prior to initiating field activities.

AMEC Response: Comment noted. The noted subject as it applies to ARARs, is occupational exposures to on-site remediation workers. Please refer to revised Table 1 (attached).

29. Section 4.5 and 5.10: Section VI.A.16 of the IO requires shipping manifests be submitted to the State at time of shipment, and the Plan proposes keeping records on site until work completion. This represents a time delay between event occurrence and submitting documents.

AMEC Response: A profile will be generated based on the analysis for disposal at a suitable and certified disposal facility. If required, a sample manifest will be generated based on the profile information and submitted for owner/agency review. At the time of shipment, a signed transporter and generator copy will be forwarded to the State of Illinois for their records. A similar copy will be kept on site and on file during the field operations. A final fully executed copy signed off by the disposal facility will be sent to the owner and a copy will be kept on file at the Site as well as presented in the AMEC report submitted to the agencies at project completion.

30. The Plan does not address demolition methods or impacts on refrigerants or underground structures/utilities/wells that may be encountered.

AMEC Response: For obvious reasons, many traditional building demolition methods such as the use of wrecking balls, or explosives for building implosion, are not an option here given the Site conditions. Demolition methods will consist primarily of the use of large excavators equipped with hydraulic shears capable of cutting or shearing steel beams and other steel supporting structures. Cranes will also be used to lower large components to the ground surface in a safe and controlled manner. Dust controls consisting of water mists and sprays will be used to limit fugitive emissions during the performance demolition work that might generate dust. Keep in mind that none of this demolition work will occur until after the MBM is removed from the areas being demolished.

Based on discussions with Estate personnel, equipment containing refrigerants was not used or is not anticipated to be present on site. Overhead electrical utilities within the Foundry Building will be relocated prior to building demolition. Gas lines entering the Foundry Building will be shut down and disconnected from the main line prior to the commencement of demolition. Monitoring wells present within the demolition work zone will be located, identified and protected (avoided) by the contractor during demolition work.

If you have any questions regarding these responses please contact me at your earliest convenience. We look forward to discussing the contents of this letter with you on April 22, 2010. We will not submit the revised Demolition Plan until we receive your feedback and concurrence to these responses.

Sincerely yours,
AMEC Geomatrix, Inc.

Bryan Stone

Bryan Stone, PE
Senior Engineer

cc: Chris Cahnovsky, Illinois EPA
Michelle Kerr, U.S. EPA Region 5
Gary Davis, Estate of Chemetco
Elliott Stegin, Industrial Asset Disposition, LLC

Attachments: Revised Table 1
Revised Figure 5

REVISED TABLE 1
RCRA REGULATORY REQUIREMENTS THAT MAY CONSTITUTE ARARS FOR THE CHEMETCO, INC. FACILITY

4/15/2010

Subject	Requirement	Federal/State Regulatory Citations	Description	Potentially applicable or relevant and appropriate (ARAR) or to be considered (TBC)	Evaluation
Recycled Products	Determining whether the MBM is classified as a by-product exhibiting a characteristic that will be reclaimed and consequently not subject to Subpart C.	40 CFR § 261.2(c)(3) / 35 IAC § 721.102/ 35 IAC § 726 Subparts C and F	Determining whether the MBM is classified as a by-product exhibiting a characteristic that will be reclaimed and consequently not subject to Subpart C.		
Hazardous waste generation and shipment to an off-site treatment, storage and/or disposal (TSD) facility	Determining whether generated waste is a RCRA hazardous waste	40 CFR §262.11/ 35 IAC § 722.111	Requirement to determine at the point of generation whether waste is a RCRA hazardous waste	ARAR for debris: cardboard; paper; wood; plastic containers, piping, and sheeting; PPE; fiberglass siding, and dry wall and decontamination water (if hazardous)	Applicable to debris and waste materials that are generated as part of demolition activities.
	Identification of RCRA hazardous waste	40 CFR §§261.2-.9, and 40 CFR Part 261 Subparts B (waste characteristics)/ 35 IAC § 721 Subpart B	Criteria for determining if a material is a RCRA solid waste and RCRA hazardous waste, and not excluded from RCRA regulation.	ARAR for debris: cardboard; paper; wood; plastic containers, piping, and sheeting; PPE; fiberglass siding, and dry wall and decontamination water (if hazardous)	Applicable to debris and waste materials that are generated as part of demolition activities.
	Labeling and packaging of RCRA hazardous wastes that will be sent off-site	40 CFR §§ 262.30-.33/ 35 IAC § 722 Subparts C, E, and H	RCRA hazardous wastes to be sent offsite to a TSD facility must be properly packaged, labeled and placarded	ARAR for debris: cardboard; paper; wood; plastic containers, piping, and sheeting; PPE; fiberglass siding, and dry wall and decontamination water (if hazardous)	Applicable to debris and waste materials that are generated as part of demolition activities.
Hazardous Materials, including Hazardous Waste, transported off-site	These regulations establish the procedures for identifying, classifying, packaging, labeling, and transporting USDOT Hazardous Materials, including Hazardous Wastes, that will be transported off-site	49 CFR §§ 171-179/ 35 IAC §§ 721 and 723	Criteria for determing a substance is a USDOT Hazardous Material, including Hazardous Waste, to be transported off site.	ARAR for packaging, labeling, documenting, loading, and transporting USDOT Hazardous Materials, which includes Hazardous Wastes.	Applicable to metal bearing materials (MBM) containing lead and cadmium levels that trigger USDOT Hazardous Materials classification being transported off-site for recycling and any Hazardous Wastes being transported off site.

REVISED TABLE 1
RCRA REGULATORY REQUIREMENTS THAT MAY CONSTITUTE ARARS FOR THE CHEMETCO, INC. FACILITY

Closure and post-closure standards for hazardous waste management units	General RCRA performance standard for hazardous waste management unit closures	40 CFR §§ 265.111 and 40 CFR §§265.114/ 35 IAC §§	Waste management units that handle RCRA hazardous waste must be closed and receive post-closure care to minimize the need for further maintenance and to control, minimize or eliminate later escape of hazardous constituents to the extent necessary to protect human health and the environment. In addition, equipment, structures and soil that become contaminated from contact with hazardous waste must be properly disposed of or contaminated.	ARAR for the Brick Shop Container Storage Area and the AAF Decontamination Area and Sump	Applicable to any storage, treatment or disposal units that would be used to manage waste materials excavated or otherwise generated.
Container Management	General RCRA requirements for managing containers used to store materials.	40 CFR § 265 Subpart I	Design and management standards for hazardous waste containers	ARAR for the containerization of the residual liquids of containerized liquids within the Foundry Building and Tank House.	Applicable for any hazardous waste that will be containerized
Occupations exposures to on-site workers	Required prior to working at a hazardous waste site	Occupational Safety and Health Act, 29 USC §§ 651-678	Regulates worker health and safety. Sets general industry standards for workplace exposure to chemicals, and sets health and safety training requirements for workers at hazardous waste sites.	ARAR	OSHA worker safety standards are independently applicable to hazardous waste sites
		29 CFR Part 1910, Subpart Z	Establishes occupational exposure levels for specific contaminants	ARAR	OSHA worker safety standards are independently applicable to hazardous waste sites
Spent Hydraulic Fluids	Determining whether generated waste is a RCRA hazardous waste	40 CFR §262.11/ 35 IAC §§	Requirement to determine at the point of generation whether waste is a RCRA hazardous waste	ARAR	Applicable to debris and waste materials that are generated as part of demolition activities.
	Identification of RCRA hazardous waste	40 CFR §§261.2-.9, and 40 CFR Part 261 Subparts B (waste characteristics)/ 35 IAC §§	Criteria for determining if a material is a RCRA solid waste and RCRA hazardous waste, and not excluded from RCRA regulation.	ARAR	Applicable to debris and waste materials that are generated as part of demolition activities.
	Labeling and packaging of RCRA hazardous wastes that will be sent off-site	40 CFR §§ 262.30-.33	RCRA hazardous wastes to be sent offsite to a TSD facility must be properly packaged, labeled and placarded	ARAR for debris cardboard and paper and PPE and decontamination water	Same as Above

REVISED TABLE 1
RCRA REGULATORY REQUIREMENTS THAT MAY CONSTITUTE ARARS FOR THE CHEMETCO, INC. FACILITY

Dust Emissions	Prevention of particulate emissions	Occupational Safety and Health Act, 29 USC §§ 651-678	Regulates worker health and safety. Sets general industry standards for workplace exposure to chemicals, and sets health and safety training requirements for workers at hazardous waste sites.	ARAR	OSHA worker safety standards are independently applicable to hazardous waste sites
		29 CFR Part 1910, Subpart Z	Establishes occupational exposure levels for specific contaminants	ARAR	OSHA worker safety standards are independently applicable to hazardous waste sites
Stormwater Permit for Construction Activities^	Prevention of runoff from construction activities.	35 IAC §§ 309.202	Regulates stormwater runoff from construction activities disturbing 5-acres or more of land. (ILR10 NPDES)	ARAR	Applicable to demolition activities,

^ - Preliminary discussions with IEPA Bureau of Water Industrial Permitting personnel suggests that since there is an existing NPDES permit and demolition work will not include slab removal, soil disturbance, or site grading, a SW construction permit is not necessary.

DRAFT

Explanation

- Monitoring well location
- Site boundary
- Proposed demolition work zone; actual demolition work zone to be demarcated in the field
- Silt fence
- Sandbags
- Paved surface
- Storm water conveyance - gravity drained
- Storm water conveyance - buried pipe, mechanical pumped
- Storm water conveyance - surface flow
- Storm water conveyance - existing aboveground 6" schedule 80 retention basin return line
- Perimeter off-site system
- Storm water collection sump with transfer pump
- Valve box

Building Legend

No.	Description
1	Foundry
2	Tank House
3	Dome Buildings
4	Main Pump House

Note:

Illustrations of existing storm water conveyance piping systems shown on this figure were provided by Chemetco Estate Personnel.

Approximate Scale in Feet
0 100 200
0 30 60
Approximate Scale in Meters

Basemap modified from Sheppard Morgan & Schwab, Inc., Site Drainage Map in Sections 15 and 16, Chouteau Township, Madison County, Illinois, dated September 1997.

Storm water conveyance to retention basin
12" Gate Valve
12" Gate Valve
12" Cast Iron Pipe
12" Gate Valve
5'-0"
Storm water conveyance from Southeast collection sump
5'-0"

Valve Box Detail
0 10 20
Approximate Scale in Feet

New Poag Road
Highway 3
Chemetco Lane
1,000,000 gallon Retention Basin
NPDES Permit #IL0025747 Outfall #5
FORMER (FILLED) COOLING CANALS (RCRA)
FORMER COOLING CANALS (RCRA) -- CURRENT STORM WATER STORAGE
SLAG STORAGE PILE & MATERIAL PROCESSING AREA
ZINC OXIDE BUNKER (RCRA)
APPROX. LOCATION OF FORMER ZINC OXIDE PITS (RCRA)
APPROX. LOCATION OF FORMER ACID IMPOUNDMENT
PUMP HOUSE
PONDS
STORM COLLECTION SYSTEM
SUMP RETURN TO POND
OPEN DRAIN CHANNEL (CONCRETE)
ABOVE GROUND DIESEL FUEL STORAGE
MATERIAL STORAGE (SCRAP METAL)
YARD DRAIN
SANITARY WASTE TREATMENT
MAINTENANCE CHEMICAL STORAGE (TO BE INDOORS)
CONCRETE
SUMP PUMP
PUMP WELL
1
2
3
4

STORM WATER BMPs DURING DEMOLITION
Former Chemetco Site
3754 Chemetco Lane
Hartford, Illinois

By: pah	Date: 04/15/10	Project No: 15210
AMEC Geomatrix		Figure 5

Y:\15210.000.0\dgn\Site location and site plan.dgn